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**BEFORE THE BOARD OF PATENT APPEALS
AND INTERFERENCES**

Application Number: 09/892,399
Filing Date: June 26, 2001
Appellant(s): CARRO, FERNANDO INCERTIS

Jack P. Friedman
For Appellant

EXAMINER'S ANSWER

This is in response to the appeal brief filed 08/09/06 appealing from the Office action mailed 03/15/06.

(1) Real Party in Interest

A statement identifying by name the real party in interest is contained in the brief.

(2) Related Appeals and Interferences

The examiner is not aware of any related appeals, interferences, or judicial proceedings which will directly affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

(3) Status of Claims

The statement of the status of claims contained in the brief is correct.

(4) Status of Amendments After Final

The appellant's statement of the status of amendments after final rejection contained in the brief is correct.

(5) Summary of Claimed Subject Matter

The summary of claimed subject matter contained in the brief is correct.

(6) Grounds of Rejection to be Reviewed on Appeal

The appellant's statement of the grounds of rejection to be reviewed on appeal is correct.

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(7) Claims Appendix

The copy of the appealed claims contained in the Appendix to the brief is correct.

(8) Evidence Relied Upon

6,148,260	MUSK et al.	11-2000
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5,986,401	THOMPSON	11-1999
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Robinson et al., "A framework for interacting with paper", Eurographics '97, Volume 16, Number 3 – Available Online at:
<http://www.cl.cam.ac.uk/Research/Origami/Origami1997c/index.html>, pages 1-9.

(9) Grounds of Rejection

The following ground(s) of rejection are applicable to the appealed claims:

Claim Rejections - 35 USC §103

The following is a quotation of 35 U.S.C. 103(a) which forms the basis for all obviousness rejections set forth in this Office action:

(a) A patent may not be obtained though the invention is not identically disclosed or described as set forth in section 102 of this title, if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains. Patentability shall not be negative by the manner in which the invention was made.

Claims 1-4, 7, 8, and 10 are rejected under 35 U.S.C. 103(a) as being unpatentable over Robinson et al. (hereinafter "Robinson"), "A framework for interacting with paper", Eurographics '97, Volume 16, Number 3 [www.cl.cam.ac.uk/Research/Origami/OrigamU997c7index.html], pages 1-9 in view of Musk et al. (hereinafter "Musk"), US 6,148,260 continuation filed 11/8/1996.

Regarding independent claim 1, Robinson teaches defining a referenced item in an electronic document in sections 3, 4.4.1, and 4.4. Robinson teaches wherein the electronic document is not derived from the physical document in section 4.1. Robinson describes here that animated documents are created with a fairly conventional WYSIWYG editor. Thus, the electronic document is created with electronic document editing software and thus is not necessarily derived from a physical document. Robinson does disclose further than the electronic document can additionally be derived by scanning conventional printed documents, however this is in addition to creating the electronic document via electronic document creation software. Robinson teaches determining the absolute coordinates of the referenced item in sections 3 and 4.4. Robinson teaches defining a link to the physical document in sections 3, 4, 4.1, and 4.4. Robinson teaches encoding the absolute coordinates in the link in sections 3 and 4.4. An electronic document and physical document work in tandem in the DigitalDesk to create and animated document.

Robinson does not teach wherein the referenced item is related to a geographic location or wherein the absolute coordinates include geographic coordinates. Musk does

teach a map document which contains reference items related to geographic locations and identified by geographic coordinates in fig. 2 and col. 1 lines 32-57. The map facilitates a user search of business services in a particular geographic area

It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Musk into Robinson to have created the claimed invention. It would have been obvious and desirable to have used the map and geographic coordinate teachings of Musk to have improved the enhanced document of Robinson so that the paper document of Robinson would have presented a map in paper form which provided geographic coordinates to reference items on the map to help a user find and locate available business services on the map. Robinson teaches in the last three sentences of section 1 that its system has been re-engineered for more general use. Maps are traditionally composed of paper and thus would have been a good candidate for the general use DigitalDesk system taught by Robinson.

Regarding dependent claim 2, Robinson teaches encoding an address of a second

electronic document in the link in sections 3,4,4.1, and 4.4. The electronic document paired with the paper document contains hybrid links composed of the interact or coordinates and the associated target location stored in the registry to point to other electronic resources such as other electronic documents.

Regarding dependent claim 3, Robinson teaches wherein the address of the second electronic document is a Uniform Resource Locator address of a web server hosting the second electronic document. The registry is a server which maintains the hyperlinked documents and the links between them,

Regarding dependent claim 4, Robinson teaches storing the coordinates in a table in sections 3 and 4.4. The each page representation in the registry maintains the associations between the coordinates and the integrators, or reference items, on the page.

Regarding dependent claim 7, Robinson does not teach wherein the referenced item is related to a geographic location; the absolute coordinates include geographic coordinates; and wherein the physical document includes a map- Musk does teach a map document which contains reference items related to geographic locations and identified by geographic coordinates. The map facilitates a user search of business services in a particular geographic area.

It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Musk into Robinson to have created the claimed invention. It would have been obvious and desirable to have used the map and geographic coordinate teachings of Musk to have improved the enhanced document of Robinson so that the paper document of Robinson would have presented a map in paper form which provided geographic coordinates to reference items on the map to help a user find and locate available business services on the map. Robinson teaches in the last three sentences of section 1 that its system has been re-engineered for more general use. Maps are traditionally composed of paper and thus would have been a good candidate for the general use DigitalDesk system taught by Robinson.

Regarding dependent claim 8, Robinson teaches wherein the electronic document is a hyper text markup language document and wherein the link uses syntactic conventions of hyper text markup language in the abstract and sections 4, 4.1, and 4.4.

Regarding dependent claim 10, Robinson does not teach wherein the geographic coordinates include longitude and latitude- Musk does teach wherein the geographic coordinates include longitude and latitude in col. 3 lines 42-44. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Musk into Robinson to have created the claimed invention. It would have been obvious and desirable to have used the longitude and latitude geographic coordinates to have improved Robinson so that the map paper document could have been used and interacted with using the DigitalDesk. Robinson teaches absolute coordinates relating to reference items on the document, but not longitude and latitude geographic coordinates, because Robinson does not specifically discuss a map example. It would have been obvious and desirable to have enhanced a traditional paper map document with the electronic reference information as taught by Robinson and Musk so that a user could have received detailed information about businesses and services available in the area displayed by the map.

Claims 5-6, 9,18-25, and 31-38 are rejected under 35 U.S.C. 103(a) as being unpatentable over Robinson et al. (hereinafter "Robinson"), "A framework for interacting with paper", Eurographics '97, Volume 16, Number 3 - [wtvw.cl.cam.ac.uk/Research/Origami/Origami1997c/index.html], pages 1-9 in view of Musk et al. (hereinafter "Musk"), US 6,148,260 continuation filed 11/8/1996 and Thompson et al. (hereinafter "Thompson"), US 5,986,401 patented 11/16/1999.

Regarding dependent claim 5, Robinson teaches computing camera coordinates from the absolute coordinates of the referenced item in sections 3 and 4.4.

Robinson teaches a calibration relationship, the desk being aligned with the physical document, and the calibration relationship being between the absolute coordinates of a selected calibration location and calibration camera coordinates of the selected calibration location on the desk, the selected calibration point having been selected from the electronic document and the desk having been selectively activated at a position corresponding to where the calibration location appears in the physical document in section 4.2. Robinson does not teach computing foil coordinates because Robinson uses a camera location system instead of a touch foil system. However, Robinson does teach the possibility of using a touch foil to identify coordinates instead of a camera in section 5. Thus, Robinson teaches that foil coordinates could have been implemented in place of camera coordinates.

Robinson does not teach wherein the referenced item is related to a geographic location or wherein the absolute coordinates include geographic coordinates. Musk does teach a map document which contains reference items related to geographic locations and identified by Geographic coordinates. The map facilitates a user search of business services in a particular geographic area.

It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Musk into Robinson to have created the claimed invention- It would have been obvious and desirable to have used the map and geographic coordinate teachings of Musk to have improved the enhanced document of Robinson so that the paper document of Robinson would have presented a map in paper form which provided geographic coordinates to reference items on the map to help a user find and locate available business services on the map. Robinson teaches in the last

three sentences of section 1 that its system has been re-engineered for more general use. Maps are traditionally composed of paper and thus would have been a good candidate for the general use DigitalDesk system taught by Robinson.

Robinson does not teach use of an opto-touch foil because Robinson uses a camera-projector system to read input from the user and display feedback to the user. Robinson teaches the consideration of a touch foil alternate position sensing system in section 5. Thompson teaches a transparent organic LED (TOLED) display for presenting feedback to a user in the abstract and fig. 2. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Thompson and Robinson to have created the claimed invention. It would have been obvious and desirable to have used the touch foil taught by Robinson and the TOLED of Thompson to have improved Robinson so that the position could have been sensed and feedback presented to the user without the user's hand or input pen interfering with either the sight of the input camera or the projection of the feedback projector of Robinson.

Regarding dependent claim 6, Robinson teaches storing camera coordinates and absolute coordinates in table called a page representation in section 3 and 4.4. Robinson does not teach storing foil coordinates because Robinson uses a camera location system instead of a touch foil system. However, Robinson does teach the possibility of using a touch foil to identify coordinates instead of a camera in section 5. Thus, Robinson teaches that foil coordinates could have been implemented in place of camera coordinates.

It would have been obvious to one of ordinary skill in the art at the time the invention was made to have modified the DigitalDesk system of Robinson to have created the claimed invention using the touch foil teaching of Robinson in section 5. It would have been

obvious and desirable to have used a touch foil instead of a camera system as taught in Robinson so that the location tracking would not have been disrupted by visually blocking the line of sight between the camera lens and the stylus accidentally with the users hand or other object.

Regarding dependent claim 9, Robinson does not teach use of an opto-touch foil because Robinson uses a camera-projector system to read input from the user and display feedback to the user. However, Robinson does teach the possibility of using a touch foil to identify coordinates instead of a camera in section 5. Thompson teaches a transparent organic LED (TOLED) display for presenting feedback to a user in the abstract and fig. 2. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Thompson and Robinson to have created the claimed invention. It would have been obvious and desirable to have used the touch foil teaching of Robinson and the TOLED of Thompson to have improved Robinson so that the position could have been sensed and feedback

presented to the user without the user's hand or input pen interfering with either the sight of the input camera or the projection of the feedback projector of Robinson.

Regarding independent claim 18, Robinson teaches calibrating a camera-projector system that is aligned on a physical document in fig. 1 and section 4.3. Robinson teaches wherein the calibrating comprises processing a calibration location comprised by a plurality of locations appearing in the physical document and being referred to in an electronic document in section fig. 2 and section 4.2. Robinson teaches that the electronic document is not derived from the physical document in section 4.1. Robinson describes here that animated documents are created with a fairly conventional WYSIWYG editor. Thus, the

electronic document is created with electronic document editing software and thus is not necessarily derived from a physical document. Robinson does disclose further than the electronic document can additionally be derived by scanning conventional printed documents, however this is in addition to creating the electronic document via electronic document creation software.

Robinson teaches wherein each location of the plurality of locations have absolute coordinates, the processing generating a calibration relationship between the absolute coordinates of the calibration location and the calibration camera coordinates of the camera-projector system, the calibration camera coordinates corresponding to where the calibration location appears in the physical document in fig. 2 and sections 4-2 and 5. Robinson teaches for each location of the plurality of locations, computing camera coordinates of the camera-projector system corresponding to where each location appears in the physical document, the computing utilizing the absolute coordinates of each location and the calibration relationship in fig. 2 and sections 4.2 and 5.

Robinson does not teach wherein the absolute coordinates include geographic coordinates. Musk does teach a map document which contains reference items related to geographic locations and identified by geographic coordinates. The map facilitates a user search of business services in a particular geographic area. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Musk into Robinson to have created the claimed invention. It would have been obvious and desirable to have used the map and geographic coordinate teachings of Musk to have improved the enhanced document of Robinson so that the paper document of Robinson would have presented a map in paper form which provided geographic

coordinates to reference items on the map to help a user find and locate available business services on the map. Robinson teaches in the last three sentences of section 1 that its system has been re-engineered for more general use. Maps are traditionally composed of paper and thus would have been a good candidate for the general use DigitalDesk system taught by Robinson.

Robinson does not teach use of an opto-touch foil because Robinson uses a camera-projector system to read input from the user and display feedback to the user. Robinson teaches the consideration of a touch foil alternate position sensing system in section 5. Thompson teaches a transparent organic LED (TOLED) display for presenting feedback to a user in the abstract and fig. 2. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Thompson and Robinson to have created the claimed invention. It would have been obvious and desirable to have used the touch foil taught by Robinson and the TOLED of Thompson to have improved Robinson so that the position could have been sensed and feedback presented to the user without the user's hand or input pen interfering with either the sight of the input camera or the projection of the feedback projector of Robinson.

Regarding dependent claim 19, Robinson teaches storing an identifier of each location, the absolute coordinates of each location, and the camera coordinates of each location in a table in sections 3 and 4.4. The each page representation in the registry maintains the associations between the coordinates and the interactors, or reference items, on the page. Robinson teaches storing camera coordinates in table called a page representation in section 3 and 4.4. Robinson does not teach storing foil coordinates because Robinson uses a camera location system instead of a touch foil system. Robinson

teaches the consideration of a touch foil alternate position sensing system in section 5. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined the touch foil teaching of Robinson into the DigitalDesk system of Robinson to have created the claimed invention. It would have been obvious and desirable to have used a touch foil instead of a camera system as taught in Robinson so that the location tracking would not have been disrupted by visually blocking the line of sight between the camera lens and the stylus accidentally with the users hand or other object.

Regarding dependent claim 20, Robinson teaches sending coordinates to the projector that illuminates a corresponding position on the physical document responsive to the projector coordinates. Robinson does not teach use foil coordinates or an opto-touch foil because Robinson uses a camera-projector system to read input from the user and display feedback to the user. Robinson teaches the consideration of a touch foil alternate position sensing system in section 5. Thompson teaches a transparent organic LED (TOLED) display for presenting feedback to a user in the abstract and fig. 2. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined the teachings of Thompson and Robinson to have created the claimed invention. It would have been obvious and desirable to have used the touch foil taught by Robinson and the TOLED of Thompson to have improved Robinson so that the position could have been sensed and feedback presented to the user without the user's hand or input pen interfering with either the sight of the input camera or the projection of the feedback projector of Robinson.

Regarding dependent claim 21, Robinson teaches responsive to a first location of the plurality of locations being selected in the electronic document, sending the

coordinates of the first location to the camera-projector system to cause an animation, which could be a blinking of light, at a first position upon the DigitalDesk corresponding to where the first location appears in the physical document in sections 3, 4.3, and 5.

Regarding dependent claim 22, Robinson teaches storing an address of a second electronic document in the table in sections 3 and 4.4.

Regarding dependent claim 23, Robinson teaches wherein the address of the second electronic document is a Uniform Resource Locator address of a web server hosting the second electronic document in sections 3 and 4.4.

Regarding dependent claims 24, Robinson does not teach use of an opto-touch foil because Robinson uses a camera-projector system to read input from the user and display feedback to the user. Robinson teaches the consideration of a touch foil alternate position sensing system in section 5. Thompson teaches a transparent organic LED (TOLED) display for presenting feedback to a user in the abstract and fig. 2. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined the teachings of Thompson and Robinson to have created the claimed invention. It would have been obvious and desirable to have used the touch foil teaching of Robinson and the TOLED of Thompson to have improved Robinson so that the position could have been sensed and feedback presented to the user without the user's hand or input pen interfering with either the sight of the input camera or the projection of the feedback projector of Robinson.

Regarding dependent claim 25, Robinson teaches responsive to the DigitalDesk being activated at a first position corresponding to where a first location of the plurality of locations appears in the physical document, causing an animation, which could be a blinking

of light, at the first position and highlighting the first position in the electronic document in sections 3, 4.3, and 5.

Regarding independent claim 31, Robinson teaches calibrating a camera-projector system that is aligned on a physical document in fig. 1 and section 4.3. Robinson teaches wherein the calibrating comprises processing a calibration location comprised by a plurality of locations appearing in the physical document and being referred to in an electronic document in section fig. 2 and section 4.2. Robinson teaches that the electronic document is not derived from the physical document in section 4.1. Robinson describes here that animated documents are created with a fairly conventional WYSIWYG editor. Thus, the electronic document is created with electronic document editing software and thus is not necessarily derived from a physical document. Robinson does disclose further than the electronic document can additionally be derived by scanning conventional printed documents, however this is in addition to creating the electronic document via electronic document creation software.

Robinson teaches wherein each location of the plurality of locations have absolute coordinates, the processing generating a calibration relationship between the absolute coordinates of the calibration location and the calibration camera coordinates of the camera-projector system, the calibration camera coordinates corresponding to where the calibration location appears in the physical document in fig. 2 and sections 4.2 and 5. Robinson teaches for each location of the plurality of locations, computing camera coordinates of the camera-projector system corresponding to where each location appears in the physical document, the computing utilizing the absolute coordinates of each location and the calibration relationship in fig. 2 and sections 4.2 and 5.

Robinson does not teach wherein the absolute coordinates include geographic coordinates. Musk does teach a map document which contains reference items related to geographic locations and identified by geographic coordinates. The map facilitates a user search of business services in a particular geographic area. It would have been obvious to one of ordinary skill in the art at the time the invention; was made to have combined Musk into Robinson to have created the claimed invention. It would have been obvious and desirable to have used the map and geographic coordinate teachings of Musk to have improved the enhanced document of Robinson so that the paper document of Robinson would have presented a map in paper form which provided geographic coordinates to reference items on the map to help a user find and locate available business services on the map. Robinson teaches in the last three sentences of section 1 that its system has been re-engineered for more general use. Maps are traditionally composed of paper and thus would have been a good candidate for the general use DighalDesk system taught by Robinson.

Robinson does not teach use of an opto-touch foil because Robinson uses a camera-projector system to read input from the user and display feedback to the user. Robinson teaches the consideration of a touch foil alternate position sensing system in section 5. Thompson teaches a transparent organic LED (TOLED) display for presenting feedback to a user in the abstract and fig. 2. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Thompson and Robinson to have created the claimed invention. It would have been obvious and desirable to have used the touch foil taught by Robinson and the TOLED of Thompson to have improved Robinson so that the position could have been sensed and feedback presented to the user without the

user's hand or input pen interfering with either the sight of the input camera or the projection of the feedback projector of Robinson.

Regarding dependent claim 32, Robinson teaches storing an identifier of each location, the absolute coordinates of each location, and the camera coordinates of each location in a table in sections 3 and 4.4. The each page representation in the registry maintains the associations between the coordinates and the interactors, or reference items, on the page. Robinson teaches storing camera coordinates in table called a page representation in section 3 and 4.4. Robinson does not teach storing foil coordinates because Robinson uses a camera location system instead of a touch foil system. Robinson teaches the consideration of a touch foil alternate position sensing system in section 5, It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined the touch foil teaching of Robinson into the DigitalDesk system of Robinson to have created the claimed invention. It would have been obvious and desirable to have used a touch foil instead of a camera system as taught in Robinson so that the location tracking would not have been disrupted by visually blocking the line of sight between the camera lens and the stylus accidentally with the users hand or other object.

Regarding dependent claim 33, Robinson teaches storing an address of a second electronic document in the table in sections 3 and 4.4.

Regarding dependent claim 34, Robinson teaches wherein the address of the second electronic document is a Uniform Resource Locator address of a web server hosting the second electronic document in sections 3 and 4.4.

Regarding dependent claim 35, Robinson teaches sending coordinates to the projector that illuminates a corresponding position on the physical document responsive to the projector coordinates. Robinson does not teach use foil coordinates or an opto-touch foil because Robinson uses a camera-projector system to read input from the user, and display feedback to the user. Robinson teaches the consideration of a touch foil alternate position sensing system in section 5. Thompson teaches a transparent organic LED (TOLED) display for presenting feedback to a user in the abstract and fig. 2. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined the teachings of Thompson and Robinson to have created the claimed invention. It would have been obvious and desirable to have used the touch foil taught by Robinson and the TOLED of Thompson to have improved Robinson so that the position could have been sensed and feedback presented to the user without the user's hand or input pen interfering with either the sight of the input camera or the projection of the feedback projector of Robinson.

Regarding dependent claim 36, Robinson teaches responsive to a first location of the plurality of locations being selected in the electronic document, sending the coordinates of the first location to the camera-projector system to cause an animation, which could be a blinking of light, at a first position upon the DigitalDesk corresponding to where the first location appears in the physical document in sections 3, 4.3, and 5.

Regarding dependent claim 37, Robinson does not teach use of an opto-touch foil because Robinson uses a camera-projector system to read input from the user and display feedback to the user. Robinson teaches the consideration of a touch foil alternate position sensing system in section 5. Thompson teaches a transparent organic LED

(TOLED) display for presenting feedback to a user in the abstract and fig. 2. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined the teachings of Thompson and Robinson to have created the claimed invention. It would have been obvious and desirable to have used the touch foil teaching of Robinson and the TOLED of Thompson to have improved Robinson so that the position could have been sensed and feedback presented to the user without the user's hand or input pen interfering with either the sight of the input camera or the projection of the feedback projector of Robinson.

Regarding dependent claim 38, Robinson teaches responsive to the DigitalDesk being activated at a first position corresponding to where a first location of the plurality of locations appears in the physical document, causing an animation, which could be a blinking of light, at the first position and highlighting the first position in the electronic document in sections 3, 4.3, and 5.

(10) Response to Argument

RESPONSE TO GROUND OF REJECTION 1

Regarding claim 1, Appellant argues Robinson in view of Musk do not teach or suggest several features of the claimed invention.

On pages 6-11 of the Appeal Brief, Appellant argues Robinson in view of Musk does not teach or suggest that the electronic document is not derived from the physical document. The Examiner respectfully disagrees. Robinson teaches in section 4.1 that the animated documents may be created with a WYSIWYG editor, or in other words and electronic document editor. Therefore, the documents may be created in electronic form prior to being printed out. Robinson offers further evidence of this in sections 4 and 4.4. In section 4 that an adaptor may be used to import or export hypertext. By enabling the registry to import hypertext, Robinson is teaching that the document may have an electronic origin. Furthermore, in section 4.4 teaches that given URL, the information can be captured on the associated web page in the registry. Again, this demonstrates that the origin of the document in the registry may be electronic and not paper. Therefore, the Examiner maintains that the combination of Robinson and Musk does teach the electronic document not being derived from the physical document.

Appellant argues on page 7 of the Brief that section 4.1 of Robinson describes that the use of a conventional WYSIWYG editor to create an animated document as is known in the prior art and that Robinson does not disclose that the conventional WYSIWYG editor is used to create animated documents for Robinson's Registry in absence of a corresponding physical document from which the electronic animated document is derived. Examiner disagrees with Appellant's assertion because not only was it "known in the prior art", as stated by Appellant on page 7, to create an animated document using a WYSIWYG editor, but also Robinson teaches creating an animated document using a WYSIWYG editor as in section 4.1. Appellant's arguments that the

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creation of such animated documents was not for the Registry is not supported.

Robinson clearly teaches creating an animated document with a WYSIWYG editor for the registry in section 4 and 4.1 where Robinson states, "The registry is accessed via a set of adaptors to allow the database to be built, edited, and imported and exported to other forms of hypertext". Furthermore, in section 2, page 3, Robinson states "Information is added to the registry by direct editing or via an adaptor importing from some other form of hypertext".

On page 8 of the Appeal Brief, Appellant argues that Robinson states the Register stores cross references between the stored image (the electronic document in the Registry) and a physical document thus teaching the document was derived from the physical document. Examiner disagrees. The mere fact that there are cross references stored between an electronic document and a physical document does not mean the electronic document was necessarily *derived* from the physical document. In fact, Robinson teaches that one adaptor can print out the electronic document from the registry onto paper for direct interaction on the DigitalDesk which suggests the physical document is derived from the electronic document, not vice-versa.

On page 10 of the Appeal Brief, Appellant argues that Examiner's statement citing section 4.4 as teaching that for a given URL, the information can be captured on the associated web page in the registry demonstrating that the origin of the document in the registry may be electronic and not paper has been misinterpreted. Specifically, Appellant argues that the URLs are links activated by placing the paper on a DigitalDesk and pointing and thus are interaction objects within the electronic document. Examiner

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disagrees as section 4.4 states "Given a URL, this captures the information on the associated web page in the registry". Thus the content located at a given URL is stored in Robinson's registry.

In view of the comments above, Examiner maintains that Robinson teaches the electronic document not being derived from the physical document. Robinson teaches in section 4.1 that the animated documents may be created with a WYSIWYG editor, or in other words and electronic document editor. Therefore, the documents maybe created in electronic form prior to being printed out. Robinson offers further evidence of this in sections 4 and 4.4. In section 4 that an adaptor may be used to import or export hypertext. By enabling the registry to import hypertext, Robinson is teaching that the document may have an electronic origin. Furthermore, in section 4.4 teaches that given URL, the information can be captured on the associated web page in the registry. Again, this demonstrates that the origin of the document in the registry may be electronic and not paper.

On pages 11-14, Appellant argues with respect to claim 1 that neither Robinson nor Musk teaches, "encoding the geographic coordinates in the geographic link". The Examiner respectfully disagrees. The Examiner's position is that for Robinson to identify the coordinates from the link, as is taught in section 4.4, and use the coordinates to look up in the registry, the coordinates are thus encoded in the link on the document. The Examiner maintains that Robinson does teach determining coordinates of the referenced item, defining the link to the physical document, and encoding the coordinates in the link under the broadest reasonable interpretations of coordinates. Musk does teach a map

document which contains reference items related to geographic locations and identified by geographic coordinates in fig. 2 and col. 1 lines 32-57 and therefore suggests modifying Robinson to use and encode geographic coordinates- Robinson devotes section 6 to exploring possible applications for the DigitalDesk and thus disagrees with Appellant's position that Robinson is not concerned with how the physical and/or electronic document is used in user applications. Therefore, the Examiner maintains that the combination of Robinson and Musk teaches and suggests determining geographic coordinates of the referenced item, defining the geographic link to the physical document, and encoding the geographic coordinates in the geographic link.

Appellant argues the storing of coordinates in a registry (as taught by Robinson in section 4.4) does not imply encoding the coordinates in the link because the coordinates could be stored anywhere in the registry not within a link and still be accessible. The Examiner's position is that for Robinson to identify the coordinates from the link, as is taught in section 4.4, and use the coordinates to look up in the registry, the coordinates are thus encoded in the link on the document. Musk does teach a map document which contains reference items related to geographic locations and identified by geographic coordinates in fig. 2 and col. 1 lines 32-57 and therefore suggests modifying Robinson to use and encode geographic coordinates- Robinson devotes section 6 to exploring possible applications for the DigitalDesk and thus disagrees with Appellant's position that Robinson is not concerned with how the physical and/or electronic document is used in user applications. Therefore, the Examiner maintains that the combination of Robinson and Musk teaches and suggests determining geographic coordinates of the

referenced item, defining the geographic link to the physical document, and encoding the geographic coordinates in the geographic link.

Appellant further argues the combination of Robinson and Musk does not teach determining geographic coordinates of the referenced item, defining the geographic link to the physical document, and encoding the geographic coordinates in the geographic link as defined in claim 1, the Examiner respectfully disagrees. The Examiner's position is that for Robinson to identify the coordinates from the link, as is taught in section 4.4, and use the coordinates to look up in the registry, the coordinates are thus encoded in the link on the document. The Examiner maintains that Robinson does teach determining coordinates of the referenced item, defining the link to the physical document, and encoding the coordinates in the link under the broadest reasonable interpretations of coordinates. Musk does teach a map document which contains reference items related to geographic locations and identified by geographic coordinates in fig. 2 and col. 1 lines 32-57 and therefore suggests modifying Robinson to use and encode geographic coordinates- Robinson devotes section 6 to exploring possible applications for the DigitalDesk and thus disagrees with Appellant's position that Robinson is not concerned with how the physical and/or electronic document is used in user applications. Therefore, the Examiner maintains that the combination of Robinson and Musk teaches and suggests determining geographic coordinates of the referenced item, defining the geographic link to the physical document, and encoding the geographic coordinates in. the geographic link.

Regarding claim 2, Appellant argues Robinson in view of Musk does not teach “wherein the step of encoding further includes the step of encoding an address of a second electronic document in the geographic link”. The Examiner respectfully disagrees. Robinson teaches in sections 3, 4, 4.1, and 4.4 that the interactor, or link, on the document may point to another document, for example using a URL encoded in the interactor link. Musk does teach a map document which contains reference items related to geographic locations and identified by geographic coordinates in fig. 2 and col. 1 lines 32-57 and therefore suggests modifying Robinson to use and encode geographic coordinates. Therefore, the Examiner maintains that the combination of Robinson and Musk teaches and suggests wherein the step of encoding further includes the step of encoding an address of a second electronic document in the geographic link.

Regarding Appellant's argument in page 17 that the combination of Robinson and Musk does not teach or suggest storing the geographic coordinates in a table as defined in claim 4, the Examiner respectfully disagrees. Robinson teaches in sections 3 and 4.4 that coordinates are stored in the table so that they can be looked up to yield the appropriate activity. Since the coordinates are looked up in the registry table, they must be stored in the table. Appellant's statement that a table is only one storage format of a multiplicity of storage formats is further proof that the coordinates could be stored in a table as suggested by use of a “registry”.

Regarding Appellant's argument in pages 18-19 that the combination of Robinson and Musk does not teach or suggest that the physical document includes a map as

defined in claim 7, the Examiner respectfully disagrees. Musk teaches a map document which contains reference items related to geographic locations and identified by geographic coordinates in fig. 2 and col. 1 lines 32-57 and therefore suggests modifying Robinson to apply the DigitalDesk to animate a map. Robinson devotes section 6 to exploring possible applications for the DigitalDesk and thus disagrees with Appellant's position that Robinson is not concerned with how the physical and/or electronic document is used in user applications. Therefore, the Examiner maintains that the combination of Robinson and Musk teaches and suggests wherein the physical document includes 3 map.

Regarding Appellant's argument in page 20 that the combination of Robinson and Musk does not teach or suggest that the electronic document is a hypertext markup language document and the geographic link uses syntactic conventions of hypertext markup language as defined in claim 8, the Examiner respectfully disagrees. Robinson teaches in section 4.4 that the electronic documents maybe imported from HTML documents and therefore teaches the limitations of claim 8. Appellant argues the documents are not imported but are exproted as HTML. Examiner disagrees as Robinson clearly teaches that given a URL, the information on an associated web page is imported from the web page. See section 4.4 "Import and export", first paragraph.

Regarding Appellant's argument in pages 20-22 that the combination of Robinson and Musk does not teach or suggest wherein the geographic coordinates include

longitude and latitude as defined in claim 10, the Examiner respectfully disagrees. Musk teaches a map document which contains reference items related to geographic locations and identified by geographic coordinates in fig. 2 and col. 1 lines 32-57 and therefore suggests modifying Robinson to apply the DigitalDesk to animate a map. Robinson devotes section 6 to exploring possible applications for the DigitalDesk and thus disagrees with Appellant's position that Robinson is not concerned with how the physical and/or electronic document is used in user applications. Musk does teach wherein the geographic coordinates include longitude and latitude in col. 3 lines 42-44. Therefore, the Examiner maintains that the combination of Robinson and Musk teaches and suggests wherein the geographic coordinates include longitude and latitude.

RESPONSE TO GROUND OF REJECTION 2

Regarding Appellant's arguments in pages 23-28 that the combination of Robinson, Musk, and Thompson does not teach a calibration relationship, touch foil, or a transparent organic LED for presenting feedback as defined in claim 5, the Examiner respectfully disagrees. Robinson shows in figure 2 and describes in section 4.2 that marks on the printed page are used to facilitate the recognition and location on the desktop. Determining the location is the calibration relationship and requires computing coordinates so that the interactors can be correctly recognized. The Examiner maintains the position that the graphics tablet taught by Robinson in section 5 is the claimed touch-foil and believes additional implied evidence that the graphics tablet is a touch foil because Robinson indicates that the graphics tablet might not work well when using a

stack of papers. The Examiner believes this implies the touch foil might not accurately assess touches from the pen due to the thickness of the stack of papers. Finally, the Examiner notes that Robinson teaches providing visual feedback in fig. 1 and section 5. Thompson teaches a TOLED in the abstract and fig. 2, one of the basic and notoriously well-known uses of a display is to provide feedback to a user. Since Robinson teaches providing visual feedback, and Thompson provides an alternate technology for providing the visual feedback, the Examiner maintains that the combination of Robinson, Musk and Thompson teaches and suggests a TOLED display providing feedback to a user.

Appellant acknowledges that the marks on the printed page as described by Robinson in Section 4.2 in relation to Figure 2, pertains to a calibration relationship. See page 24 or the Arguments. Appellant, however, further argues that Robinson does not disclose the calibration relationship associated with marks on the printed page is "between geographic coordinates of a selected calibration location and calibration foil coordinates of the selected calibration location on the opto-touch foil". Examiner respectfully disagrees. Robinson shows in figure 2 and describes in section 4.2 that marks on the printed page are used to facilitate the recognition and location on the desktop. Determining the location is the calibration relationship and requires computing coordinates so that the interactors can be correctly recognized. The Examiner maintains the position that the graphics tablet taught by Robinson in section 5 is the claimed touch-foil and believes addition implied evidence that the graphics tablet is a touch foil because Robinson indicates that the graphics tablet might not work well when using a stack of papers. The Examiner believes this implies the touch foil might not accurately assess touches from the pen due to the thickness of the stack of

papers. Finally, the Examiner notes that Robinson teaches providing visual feedback in fig. 1 and section 5. Thompson teaches a TOLED in the abstract and fig. 2. One of the basic and notoriously well known uses of a display is to provide feedback to a user. Since Robinson teaches providing visual feedback, and Thompson provides an alternate technology for providing the visual feedback, the Examiner maintains that the combination of Robinson, Musk and Thompson teaches and suggests a TOLED display providing feedback to a user.

Regarding Appellant's argument in pages 28-29 that the combination of Robinson, Musk, and Thompson does not teach or suggest storing geographic coordinates in a table or storing foil coordinates in a table as defined in claim 6, the Examiner respectfully disagrees. The Examiner maintains that the registry described in section 3 organizes electronic document data and reads upon a table. Robinson shows in figure 2 and describes in section 4.2 that marks on the printed page are used to facilitate the recognition and location on the desktop. Determining the location is the calibration relationship and requires computing coordinates so that the interactors can be correctly recognized- The Examiner maintains the position that the graphics tablet taught by Robinson in section 5 is the claimed touch-foil and believes addition implied evidence that the graphics tablet is a touch foil because Robinson indicates that the graphics tablet might not work well when using a stack of papers. The Examiner believes this implies the touch foil might not accurately assess touches from the pen due to the thickness of the stack of papers. Therefore, the Examiner maintains the rejection of claim 6 as being unpatentable over Robinson, Musk, and Thompson.

Regarding Appellant's argument in pages 29-31 that the combination of Robinson, Mask, and Thompson does not teach or suggest wherein the opto-foil comprises a touch foil and a transparent light emitting foil such that the touch foil is adapted to being directly touched or pressed and the light emitting foil is disposed between the touch foil and the physical document as defined in claim 9, the Examiner respectfully disagrees. The Examiner maintains the position that the graphics tablet taught by Robinson in section 5 is the claimed touch-foil and believes additional implied evidence that the graphics tablet is a touch foil because Robinson indicates that the graphics tablet might not work well when using a stack of papers. The Examiner believes this implies the touch foil might not accurately assess touches from the pen due to the thickness of the stack of papers. The Examiner also notes that Robinson teaches providing visual feedback in fig. 1 and section 5. Thompson teaches a TOLED in the abstract and fig. 2- One of the basic and notoriously well known uses of a display is to provide feedback to a user. Since Robinson teaches providing visual feedback, and Thompson provides an alternate technology for providing the visual feedback, the Examiner maintains that the combination of Robinson, Musk and Thompson teaches and suggests a TOLED display providing feedback to a user.

Regarding Appellant's argument in pages 31-37 that the combination of Robinson, Musk, and Thompson does not teach or suggest calibrating an opto-touch foil that is aligned on the physical document, the calibrating comprising processing a calibration location comprised by a plurality of location appearing in the physical document and being referred to in an electronic document, the electronic document not being derived from the physical

document, each location of the plurality of locations having geographical coordinates, the processing generating a calibration relationship between the geographic coordinates of the calibration location and the calibration foil coordinates of the opto-touch foil, said calibration foil coordinates corresponding to where the calibration location appears in the physical document as defined in claims 18 and 31, the Examiner respectfully disagrees. Robinson teaches in section 4.1 that the animated documents may be created with a WYSIWYG editor, or in other words and electronic document editor. Therefore, the documents may be created in electronic form prior to being printed out. Robinson offers further evidence of this in sections 4 and 4.4. In section 4 that an adaptor may be used to import or export hypertext. By enabling the registry to import hypertext, Robinson is teaching that the document may have an electronic origin. Furthermore, in section 4.4 teaches that given URL, the information can be captured on the associated web page in the registry. Again, this demonstrates that the origin of the document in the registry may be electronic and not paper. Therefore, the Examiner maintains that the combination of Robinson and Musk does teach the electronic document not being derived from the physical document. Robinson shows in figure 2 and describes in section 4.2 that marks on the printed page are used to facilitate the recognition and location on the desktop. Determining the location is the calibration relationship and requires computing coordinates so that the interactors can be correctly recognized. The Examiner maintains the position that the graphics tablet taught by Robinson in section 5 is the claimed touch-foil and believes additional implied evidence that the graphics tablet is a touch foil because Robinson indicates that the graphics tablet might not work well when using a stack of papers. The Examiner believes this implies the touch foil might not accurately assess touches from the pen due to the thickness of the stack of

papers. Finally, the Examiner notes that Robinson teaches providing visual feedback in fig. 1 and section 5. Thompson teaches a TOLED in the abstract and fig. 2. One of the basic and notoriously well known uses of a display is to provide feedback to a user. Since Robinson teaches providing visual feedback, and Thompson provides an alternate technology for providing the visual feedback, the Examiner maintains that the combination of Robinson, Musk and Thompson teaches and suggests a TOLED display providing feedback to a user.

Regarding Appellant's argument in pages 31-37 that the combination of Robinson, Musk, and Thompson does not teach or suggest for each location of the plurality of locations, computing foil coordinates of the opto-touch foil corresponding to where each location appears in the physical document, said computing utilizing the geographic coordinates of each location and the calibration relationship as defined in claims 18 and 31, the Examiner respectfully disagrees. Robinson shows in figure 2 and describes in section 4.2 that marks on the printed page are used to facilitate the recognition and location on the desktop. Determining the location is the calibration relationship and requires computing coordinates so that the interactors can be correctly recognized. The Examiner maintains the position that the graphics tablet taught by Robinson in section 5 is the claimed touch-foil and believes additional implied evidence that the graphics tablet is a touch foil because Robinson indicates that the graphics tablet might not work well when using a stack of papers. The Examiner believes this implies the touch foil might not accurately assess touches from the pen due to the thickness of the stack of papers. The Examiner's position is that for Robinson to identify the coordinates from the link, as is

taught in section 4.4, and use the coordinates to look up in the registry, the coordinates are thus encoded in the link on the document. The Examiner maintains that Robinson does teach determining coordinates of the referenced item, defining the link to the physical document, and encoding the coordinates in the link under the broadest reasonable interpretations of coordinates. Musk does teach a map document which contains reference items related to geographic locations and identified by geographic coordinates in fig. 2 and col. 1 lines 32-57 and therefore suggests modifying Robinson to use and encode geographic coordinates. Robinson devotes section 6 to exploring possible applications for the DigitalDesk and thus disagrees with Appellant's position that Robinson is not concerned with how the physical and/or electronic document is used in user applications. Therefore, the Examiner maintains that the combination of Robinson, Musk, and Thompson teaches and suggests for each location of the plurality of locations, computing foil coordinates of the opto-touch foil corresponding to where each location appears in the physical document, said computing utilizing the geographic coordinates of each location and the calibration relationship.

Appellant acknowledges that the marks on the printed page as described by Robinson in Section 4.2 in relation to Figure 2, pertains to a calibration relationship. See page 32 of the Arguments. Appellant, however, further argues that Robinson does not disclose the calibration relationship associated with marks on the printed page is "between geographic coordinates of a selected calibration location and calibration foil coordinates of the selected calibration location on the opto-touch foil". Examiner respectfully disagrees. Robinson shows in figure 2 and describes in section 4.2 that marks on the printed page are used to facilitate

the recognition and location on the desktop. Determining the location is the calibration relationship and requires computing coordinates so that the interactors can be correctly recognized. The Examiner maintains the position that the graphics tablet taught by Robinson in section 5 is the claimed touch-foil and believes additional implied evidence that the graphics tablet is a touch foil because Robinson indicates that the graphics tablet might not work well when using a stack of papers. The Examiner believes this implies the touch foil might not accurately assess touches from the pen due to the thickness of the stack of papers. Finally, the Examiner notes that Robinson teaches providing visual feedback in fig. 1 and section 5. Thompson teaches a TOLED in the abstract and fig. 2. One of the basic and notoriously well known uses of a display is to provide feedback to a user. Since Robinson teaches providing visual feedback, and Thompson provides an alternate technology for providing the visual feedback, the Examiner maintains that the combination of Robinson, Musk and Thompson teaches and suggests a TOLED display providing feedback to a user.

On pages 34-36 of the Appeal Brief, Appellant argues Robinson in view of Musk does not teach or suggest that the electronic document is not derived from the physical document. The Examiner respectfully disagrees. Robinson teaches in section 4.1 that the animated documents may be created with a WYSIWYG editor, or in other words and electronic document editor. Therefore, the documents may be created in electronic form prior to being printed out. Robinson offers further evidence of this in sections 4 and 4.4. In section 4 that an adaptor may be used to import or export hypertext. By enabling the registry to import hypertext, Robinson is teaching that the document may have an

electronic origin. Furthermore, in section 4.4 teaches that given URL, the information can be captured on the associated web page in the registry. Again, this demonstrates that the origin of the document in the registry may be electronic and not paper. Therefore, the Examiner maintains that the combination of Robinson and Musk does teach the electronic document not being derived from the physical document.

Appellant argues on page 35 of the Brief that section 4.1 of Robinson describes that the use of a conventional WYSIWYG editor to create an animated document as is known in the prior art and that Robinson does not disclose that the conventional WYSIWYG editor is used to create animated documents for Robinson's Registry in absence of a corresponding physical document from which the electronic animated document is derived. Examiner disagrees with Appellant's assertion because not only was it "known in the prior art", as stated by Appellant on page 7, to create an animated document using a WYSIWYG editor, but also Robinson teaches creating an animated document using a WYSIWYG editor as in section 4.1. Appellant's arguments that the creation of such animated documents was not for the Registry is not supported. Robinson clearly teaches creating an animated document with a WYSIWYG editor for the registry in section 4 and 4.1 where Robinson states, "The registry is accessed via a set of adaptors to allow the database to be built, edited, and imported and exported to other forms of hypertext". Furthermore, in section 2, page 3, Robinson states "Information is added to the registry by direct editing or via an adaptor importing from some other form of hypertext".

On page 35 of the Appeal Brief, Appellant argues that Robinson states the Register stores cross references between the stored image (the electronic document in the Registry) and a physical document thus teaching the document was derived from the physical document. Examiner disagrees. The mere fact that there are cross references stored between an electronic document and a physical document does not mean the electronic document was necessarily *derived* from the physical document. In fact, Robinson teaches that one adaptor can print out the electronic document from the registry onto paper for direct interaction on the DigitalDesk which suggests the physical document is derived from the electronic document, not vice-versa.

In view of the comments above, Examiner maintains that Robinson teaches the electronic document not being derived from the physical document. Robinson teaches in section 4.1 that the animated documents may be created with a WYSIWYG editor, or in other words and electronic document editor. Therefore, the documents maybe created in electronic form prior to being printed out. Robinson offers further evidence of this in sections 4 and 4.4. In section 4 that an adaptor may be used to import or export hypertext. By enabling the registry to import hypertext, Robinson is teaching that the document may have an electronic origin. Furthermore, in section 4.4 teaches that given URL, the information can be captured on the associated web page in the registry. Again, this demonstrates that the origin of the document in the registry may be electronic and not paper.

Regarding Appellant's argument in pages 37-38 that the combination of Robinson, Musk, and Thompson does not teach or suggest storing in a table for each location of the plurality of locations: an identifier of each location, the geographic coordinates of each location, and the foil coordinates of each location as defined in claims 19 and 32, the Examiner respectfully disagrees. Robinson teaches in sections 3 and 4.4 that coordinates are stored in the table so that they can be looked up to yield the appropriate activity. Since the coordinates are looked up in the registry table, they must be stored in the table. The Examiner maintains the position that the graphics tablet taught by Robinson in section 5 is the claimed touch-foil and believes addition implied evidence that the graphics tablet is a touch foil because Robinson indicates that the graphics tablet might not work well when using a stack of papers. The Examiner believes this implies the touch foil might not accurately assess touches from the pen due to the thickness of the stack of papers.

Regarding Appellant's argument in pages 39-40 that the combination of Robinson, Musk, and Thompson does not teach or suggest sending the computed foil coordinates to the opto-touch foil to cause illumination of positions upon the opto-touch foil corresponding to where each location of the plurality of locations appears in the physical document as defined in claims 20 and 35, the Examiner respectfully disagrees. The Examiner maintains the position that the graphics tablet taught by Robinson in section 5 is the claimed touch-foil and believes addition implied evidence that the graphics tablet is a touch foil because Robinson indicates that the graphics tablet might not work well when using a stack of papers. The Examiner believes this implies the touch foil might not accurately assess touches from the pen due to the thickness of the stack of papers. The Examiner also notes

that Robinson teaches providing visual feedback in fig. 1 and section 5. Thompson teaches a TOLED in the abstract and fig. 2. One of the basic and notoriously well known uses of a display is to provide feedback to a user. Since Robinson teaches providing visual feedback, and Thompson provides an alternate technology for providing the visual feedback, the Examiner maintains that the combination of Robinson, Musk and Thompson teaches and suggests a TOLED display providing feedback to a user.

Regarding Appellant's argument in pages 40-41 that the combination of Robinson, Musk, and Thompson does not teach or suggest responsive to a first location of the plurality of location being selected in the electronic document, sending the foil coordinates of the first location to the opto-touch foil to cause blinking of light at a first position upon the opto-touch foil corresponding to where the first location appears in the physical document as defined in claims 21 and 36, the Examiner respectfully disagrees. Robinson teaches animated visual feedback for the user in fig. 1, the abstract, section 5, and section 6. Blinking light is an animated visual feedback and Robinson is certainly capable of blinking light. Robinson teaches projecting visual feedback animations at the interactors in sections 5 and 6 and therefore teaches providing animations at specific locations on the physical document. Therefore, the Examiner maintains that the combination of Robinson, Musk, and Thompson teaches and suggests responsive to a first location of the plurality of location being selected in the electronic document, sending the foil coordinates of the first location to the opto-touch foil to cause blinking of light at a first position upon the opto-touch foil corresponding to where the first location appears in the physical document.

Regarding Appellant's argument on pages 41-42 that the combination of Robinson, Musk, and Thompson does not teach or suggest storing an address of a second electronic document in the table as defined in claims 22 and 33, the Examiner respectfully disagrees. Robinson teaches in sections 3, 4, 4.1, and 4.4 that the interactor, or link, on the document may point to another document, for example using a URL encoded in the interactor link. Robinson teaches in sections 3 and 4.4 that coordinates are stored in the table so that they can be looked up to yield the appropriate activity. Since the coordinates are looked up in the registry table, they must be stored in the table. Therefore, the Examiner maintains that the combination of Robinson, Musk, and Thompson teaches and suggests storing an address of a second electronic document in the table.

Regarding Appellant's argument in pages 42-44 that the combination of Robinson, Musk, and Thompson does not teach or suggest wherein the opto-foil comprises a touch foil and a transparent light emitting foil such that the touch foil is adapted to being directly touched or pressed and the light emitting foil is disposed between the touch foil and the physical document as defined in claims 24 and 35, the Examiner respectfully disagrees. The Examiner maintains the position that the graphics tablet taught by Robinson in section 5 is the claimed touch-foil and believes additional implied evidence that the graphics tablet is a touch foil because Robinson indicates that the graphics tablet might not work well when using a stack of papers. The Examiner believes this implies the touch foil might not accurately assess touches from the pen due to the thickness of the stack of papers. The Examiner also notes that Robinson teaches providing visual feedback in fig. 1 and section 5.


Thompson teaches a TOLED in the abstract and fig. 2. One of the basic and notoriously well known uses of a display is to provide feedback to a user. Since Robinson teaches providing visual feedback, and Thompson provides an alternate technology for providing the visual feedback, the Examiner maintains that the combination of Robinson, Musk and Thompson teaches and suggests a TOLED display providing feedback to a user.

Regarding Appellant's argument in pages 44-45 that the combination of Robinson, Musk, and Thompson does not teach or suggest responsive to the opto-touch foil being pressed or touched at a first position corresponding to where a first location of the plurality of locations appears in the physical document., causing a blinking of light at the first position and highlighting the first location in the electronic document as defined in claims 25 and 38, the Examiner respectfully disagrees. Robinson teaches animated visual feedback for the user in fig. 1, the abstract, section 5, and section 6. Blinking light is an animated visual feedback and Robinson is certainly capable of blinking light. Robinson teaches projecting visual feedback animations at the interactors in sections 5 and 6 and therefore teaches providing animations at specific locations on the physical document. Therefore, the Examiner maintains that the combination of Robinson, Musk, and Thompson teaches and suggests responsive to a first location of the plurality of location being selected in the electronic document, sending the foil coordinates of the first location to the opto-touch foil to cause blinking of light at a first position upon the opto-touch foil corresponding to where the first location appears in the physical document.

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For the above reasons, it is believed that the rejections should be sustained.

Respectfully submitted,




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